

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO WAVE 6 CASES AND PLAINTIFFS	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**JOINT MOTION TO TAKE DEPOSITION OF
DR. LAWRENCE LIND AFTER DISCOVERY IS CLOSED**

Plaintiffs and Defendants, Ethicon, Inc. and Johnson & Johnson (collectively, “Ethicon”), move to take the deposition of Dr. Lawrence Lind, the general causation expert for Defendants, on October 11, 2017, which is two and a half weeks after the close of discovery. In support of this motion, the parties state:

1. In August 2017, plaintiffs’ counsel requested a date for the deposition of Dr. Lawrence Lind, who has been designated as a general causation expert for Defendants.

2. Defendants’ counsel, Ethicon, diligently worked to obtain deposition dates of Dr. Lind before the September 25, 2017, discovery cut-off.

3. Defense counsel offered September 15, 2017 for Dr. Lind’s deposition, however, Plaintiffs’ counsel was not available on that date. Despite good faith efforts by all parties to schedule Dr. Lind’s deposition within the discovery period, the parties were unable to do so because of scheduling issues involving Dr. Lind and counsel.

4. The earliest time that Dr. Lind is available for deposition is October 11, 2017.

5. The parties request that this Court allow the deposition of Dr. Lind on October 11, 2017.

6. Because this motion is self-explanatory, the parties request to be relieved from submitting a supporting memorandum.

WHEREFORE, the parties request that the Court grant their unopposed motion to take the deposition of Dr. Lind on October 11, 2017.

Dated: September 25, 2017

Respectfully submitted,

s/ Bryan F. Aylstock
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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on September 25, 2017, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

s/ Bryan F. Aylstock
Attorney for Plaintiffs